

ESTTA Tracking number: **ESTTA1332798**Filing date: **01/08/2024**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding no.	91288244
Party	Defendant World Wrestling Entertainment, Inc.
Correspondence address	LAUREN A. DIENES-MIDDLEN WORLD WRESTLING ENTERTAINMENT, INC. 1241 EAST MAIN STREET STAMFORD, CT 06902 UNITED STATES Primary email: lauren.middlen@wwecorp.com 203-353-2827
Submission	Answer
Filer's name	Laura K. Pitts
Filer's email	laura.pitts@bipc.com, mark.kornfeld@bipc.com, soenya.randolph@bipc.com, lauren.middlen@wwecorp.com
Signature	/Laura K. Pitts/
Date	01/08/2024
Attachments	BIG TIME BECKS - FINAL - Answer to Notice of Opposition - Opp. No. 91 288244.pdf(83619 bytes )



5. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same.

6. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

7. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

8. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

9. Applicant admits that 1241 East Main Street, Stamford CONNECTICUT 06902 was Applicant's address at the time that the Big Time Becks Application was filed, but its current business address is 707 Washington Blvd., Stamford, CT 06901. Similarly, Applicant admits that Applicant was a Delaware corporation at the time Big Time Becks Application was filed. However, Applicant converted from World Wrestling Entertainment, Inc., a Delaware corporation, to World Wrestling Entertainment, LLC, a Delaware limited liability company, on September 12, 2023.

10. Applicant denies that the Big Time Becks Application was filed under Trademark Act Section 1(a). The remainder of this Paragraph is admitted.

11. Admitted.

12. Admitted.

13. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same.

14. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same.

15. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Applicant admits that the mark in Applicant's Big Time Becks Application consists of standard characters and does not claim any particular font style, size, or color. Applicant lacks sufficient information to form a belief as to the remaining allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

21. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

22. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

23. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

24. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

25. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

26. Applicant lacks sufficient information to form a belief as to the allegations in this Paragraph, and therefore denies the same. This Paragraph also contains legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

27. This Paragraph consists of legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

28. This Paragraph consists of legal conclusions to which a response is not required. To the extent a response is required, the allegations are denied.

WHEREFORE, Applicant requests that the Opposition be denied; that Application Serial No. 97/024,008 be allowed to register; and for such further relief as may be proper.

Respectfully submitted,

World Wrestling Entertainment, LLC

By:                   /Laura K. Pitts/                    
Laura K. Pitts  
Mark A. Kornfeld  
Attorneys for Applicant  
Buchanan Ingersoll & Rooney PC  
1737 King Street, Suite 500  
Alexandria, Virginia 22314-2727  
Telephone: 703-836-6620

Date: January 8, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing ANSWER TO NOTICE OF OPPOSITION was served this 8<sup>th</sup> day of January, 2024 via email to:

Mr. James K. Duck  
Trademark Owner  
1307 S. 7TH STREET  
DEKALB, IL 60115  
wcpwowner@gmail.com

/Laura K. Pitts/  
Laura K. Pitts